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UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,
22 Defendants.
23

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
DEFENDANTS' AMENDED
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL EXHIBITS TO
THEIR MOTION TO COMPEL
RESPONSES TO
INTERROGATORIES AND
PRODUCTION OF DOCUMENTS**

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
 3 declaration based upon matters within my own personal knowledge and if called as a witness, I
 4 could and would competently testify to the matters set forth herein. I make this declaration in
 5 support of Defendants' Amended Administrative Motion to File Under Seal Exhibits to their
 6 Motion to Compel Responses to Interrogatories and Production of Documents (Dkt. 684).¹

7 2. I have reviewed the following documents and confirmed that only the portions
 8 identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 1A	Highlighted Portions	Plaintiff
Exhibit 3	Entire Document	Plaintiff
Exhibit 6	Entire Document	Plaintiff
Exhibit 15	Highlighted Portions	Defendants
Exhibit 18	Entire Document	Plaintiff
Exhibit 21	Highlighted Portions	Plaintiff

17 3. Exhibit 1A is Uber's First Set of Requests for Production, and Exhibit 3 is
 18 Waymo's Responses to these Requests for Production. I understand that the highlighted portions
 19 of Exhibit 1A contain technical information designated by Waymo as either confidential or highly
 20 confidential. Exhibit 3 was designated by Waymo as "Highly Confidential – Attorneys' Eyes
 21 Only" by Waymo under the Protective Order.

22 4. Exhibit 6 is Waymo's Responses to Uber's First set of Interrogatories, which was
 23 likewise designated "Highly Confidential – Attorneys' Eyes Only" by Waymo under the
 24 Protective Order.

25
 26
 27 1 This Amended Declaration has been revised from the original (Dkt. 684-1) only with
 28 respect to Exhibit 15, in order to narrow Defendants' request for sealing.

1 5. The highlighted portions of Exhibit 15 contain the email address of a high-ranking
2 company executive. Defendants seek to seal this information in order to protect the privacy of
3 this executive, as prominent individuals at a company are currently the subject of extensive media
4 coverage. Disclosure of this information for such high-ranking executives could expose them to
5 harm or harassment.

6 6. Exhibit 18 is an internal Google presentation regarding competition. This
7 presentation has been designated as “Highly Confidential – Attorneys’ Eyes Only” by Waymo.

8 7. Exhibit 21 is Waymo’s Third Set of Requests for Production to Uber. The
9 highlighted portions of Exhibit 21 have been designated as “Highly Confidential – Attorneys’
10 Eyes Only” by Waymo.

11 8. Defendants' request to seal is narrowly tailored to the specific exhibits attached to
12 Defendants' Motion to Compel that merit sealing.

13 I declare under penalty of perjury that the foregoing is true and correct. Executed this
14 28th day of June, 2017 at Washington, D.C.

/s/ Michelle Yang
Michelle Yang

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

23 || Dated: June 28, 2017

/s/ Arturo J. González
Arturo J. González